

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA**

PROJECT ON PREDATORY STUDENT  
LENDING OF THE LEGAL SERVICES  
CENTER OF HARVARD LAW SCHOOL,

*Plaintiff,*

v.

UNITED STATES DEPARTMENT OF  
JUSTICE,

*Defendant.*

Civil No. 2:17-cv-00210-NBF

Hon. Nora Barry Fischer

*(Electronic Filing)*

**TENTH POST-JUDGMENT STATUS REPORT**

The parties respectfully submit this joint status report pursuant to this Court's Order of June 3, 2019. Order, ECF No. 104.

Since the filing of the Parties' last joint status report on May 31, 2019, ECF No. 102, and consistent with the Parties' stipulation, ECF No. 103, which was endorsed by the Court, ECF No. 104, Defendant sent four reproductions of documents to Plaintiff, on June 4, June 10, June 17, and June 24. Thereafter, Defendant identified the remaining documents as falling into two categories, either: (1) pages Defendant determined not to reproduce, or (2) pages duplicative of other pages that Defendant had already reproduced. To ensure the Parties were clear about which pages had been reproduced and when, Defendant prepared an inventory to share with Plaintiff. In the process of creating that inventory, Defendant identified an additional 128 pages (approximate) of documents that it determined could be reproduced to Plaintiff with modified redactions; Defendant reproduced 26 of those pages to Plaintiff on July 9, and is currently processing the remainder to reproduce to Plaintiff by July 11.

On July 10, Defendant provided Plaintiff with the inventory described above, which lists the pages from the October 2018 production that Defendant subsequently reproduced with modified redactions, as well as those pages Defendant determined not to reproduce. The Parties intend and propose that Plaintiff's counsel will review this inventory and the recently reproduced documents, and will address with Defendant within the next three weeks, *i.e.*, by July 30, 2019, any outstanding questions Plaintiff may have with respect to the reproductions of documents.

The parties respectfully propose filing a joint status report by July 30, 2019, to advise the Court whether any issues remain with respect to the AI Dallas CD documents.

Dated: July 10, 2019

Respectfully submitted,

/s/ Eileen Connor  
TOBY MERRILL  
EILEEN CONNOR  
Legal Services Center of Harvard  
Law School  
122 Boylston Street  
Jamaica Plain, MA 02140  
Tel: (617) 390-2710  
Fax: (617) 522-0715  
tomerrill@law.harvard.edu  
econnor@law.harvard.edu

JENNIFER BENNETT  
Public Justice  
475 14th St., Suite 610  
Oakland, CA 94612  
(510) 622-8150  
jbennett@publicjustice.net

*Counsel for Plaintiff*

JOSEPH H. HUNT  
Assistant Attorney General  
Civil Division

STEPHEN R. KAUFMAN  
First Assistant United States Attorney

ELIZABETH J. SHAPIRO  
Deputy Director  
Civil Division, Federal Programs Branch

/s/ Lisa Zeidner Marcus  
LISA ZEIDNER MARCUS  
Senior Counsel  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
700 Grant St., Suite 4000  
Pittsburgh, PA 15217  
Telephone: (202) 514-3336  
Fax: (412) 644-2613  
Email: lisa.marcus@usdoj.gov

KAREN GAL-OR  
Assistant U.S. Attorney  
Western District of Pennsylvania  
Joseph F. Weis, Jr. U.S. Courthouse  
700 Grant Street, Suite 4000  
Pittsburgh, PA 15219  
(412) 894-7326

*Counsel for Defendant*